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DAVID J. WARD (CA State Bar No. 239504)
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	No. CR 07-0765 MHP (EMC)
)	
Plaintiff,)	
)	
v.)	MOTION TO FILE ATTACHMENTS TO
)	DECLARATION OF DAVID J. WARD
)	UNDER SEAL AND [PROPOSED] ORDER
MENDEL BEKER,)	
a.k.a. Mikhail Lvovich,)	
a.k.a. Michael Beker,)	
ARIE PRILIK and)	
NEWCON INTERNATIONAL LTD.)	
)	
Defendants.)	

The United States moves under Civil Local Rules 7-10 and 79-5 for leave to file under seal the attachments filed with the Declaration of David J. Ward filed in support of the Government's Opposition to the Defendants' Motion for Modification of Conditions of Release.

This motion is made on the grounds that the attachments include documents covered by the Interim Stipulated Protective Order signed by the Honorable Marilyn Hall Patel on March 4, 2010, and as required by the Protective Order, are to be filed under seal.

The United States therefore requests that this Court permit it to file under seal attachments filed with the Declaration of David J. Ward filed in support of the Government's Opposition to the Defendants' Motion for Modification of Conditions of Release.

*MOTION TO SEAL AND [PROPOSED]
ORDER [CR 07-0765 MHP (EMC)]*

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2 Dated: March 15, 2010

3 Respectfully submitted,

4 /s/
5 DAVID J. WARD
6 Trial Attorney

7 Upon application of the United States, and good cause appearing therefore, IT IS HEREBY
8 ORDERED that the following documents be sealed: the attachments to the Declaration of David
9 Ward filed in support of the Government's Opposition to the Defendants' Motion for Modification
10 of Conditions of Release.

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13 DATED: March ____, 2010
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17 HONORABLE EDWARD M. CHEN
18 United States Magistrate Judge
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